

**EXHIBIT A**

**PROPOSED ORDER**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

JLM COUTURE, INC.,

Debtor.

Chapter 11  
(Subchapter V)

Case No. 23-11659 (JKS)

**Re: Docket No. \_\_\_\_\_**

**ORDER GRANTING DEBTOR’S MOTION FOR ENTRY OF AN ORDER PURSUANT  
TO BANKRUPTCY RULE 9019 APPROVING SETTLEMENT AGREEMENT BY AND  
AMONG THE DEBTOR AND HAYLEY PAIGE GUTMAN**

Upon the motion (the “Motion”)<sup>1</sup> of JLM Couture, Inc. (the “Debtor”), the above-captioned debtor and debtor-in-possession, pursuant to Bankruptcy Rule 9019, for entry of an order approving a settlement agreement (the “Settlement Agreement”) by and between the Debtor and Hayley Paige Gutman (“Ms. Gutman” and together with the Debtor, the “Parties”), as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware* dated as of February 29, 2012; and consideration of the Motion and the relief requested being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having determined that the relief sought in the Motion is in the best interests of the Debtor, its creditors and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED THAT:

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<sup>1</sup> Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to them in the Motion or the Settlement Agreement.

1. Pursuant to Bankruptcy Rule 9019, the Settlement Agreement, attached hereto as Exhibit 1 is approved and effective upon entry of this Order.

2. The Debtor, Ms. Gutman, Mr. Murphy and Mr. Clevlen are hereby authorized and directed to take all steps necessary to effectuate the Settlement Agreement.

3. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

**EXHIBIT 1**

**SETTLEMENT AGREEMENT**

**[FILED UNDER SEAL]**